

ALASKAN COPPER & BRASS COMPANY*Stainless Steel**Aluminum*

August 31, 2020

Ravi Sanga, Remedial Project Manager
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900, MS ECL-122
Seattle, WA 98101-3140

VIA EMAIL TO: sanga.ravi@epa.gov

Re: Harbor Island Superfund Site, East Waterway Operable Unit
King County, Washington
Request for Information and Documents
Section 104(e) of CERCLA, 42 U.S.C. § 9604(e)

Dear Mr. Sanga:

Alaskan Copper Companies, Inc., d/b/a Alaskan Copper & Brass Company ("Respondent") hereby timely responds to EPA's Request for Information pursuant to CERCLA Section 104(e) in the attached enclosure.

Sincerely yours,

ALASKAN COPPER & BRASS COMPANY



Adam Rosen
Property Manager
Alaskan Copper Companies, Inc.

Enclosure: Alaskan Copper & Brass Company's Response to EPA's Request for Information and Documents

cc: Sheila Fleming, Acting Director, EPA, Region 10
Richard D. Mednick, Associate Regional Counsel, EPA, Region 10

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ENCLOSURE

**ALASKAN COPPER & BRASS COMPANY'S RESPONSES TO THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY'S REQUEST FOR INFORMATION AND DOCUMENTS
PURSUANT TO THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND
LIABILITY ACT**

**East Waterway Operable Unit
Harbor Island Site**

INFORMATION REQUEST

A. OVERVIEW

Respondent: Alaskan Copper & Brass Company

Facility: East Waterway Operable Unit of the Harbor Island Site
City of Seattle, King County, Washington

Subject Property: Each parcel of property located within one mile of the East
Waterway Operable Unit that is currently or was previously owned
by Respondent or where Respondent conducts or has conducted
any activities or operations

Date: First involvement with the Subject Property to the present

This Request for Information and Documents (Request) is provided by the United States Environmental Protection Agency (EPA) pursuant to Section 104(e)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(e)(2). The focus of this Request is the East Waterway Operable Unit (EWOU) of the Harbor Island Site located in Seattle, King County, Washington. Information in the possession of the EPA suggests that Respondent owns or has owned property in the vicinity of the EWOU and that Respondent or its tenant(s) may have conducted operations within the vicinity of the EWOU.

The EWOU is shown on the attached figure. The southern boundary abuts the northern boundary of the Lower Duwamish Waterway Site. The northern boundary extends along the western pierhead line to the north until water depths reach ~60 feet mean lower low water (MLLW). The boundary follows the approximate upper edge of this naturally occurring slope at about -60 feet MLLW, then turns to perpendicularly intersect the bulkhead along Terminal 46 (T-46) along the eastern shoreline. The east and west boundaries are areas below mean higher high water (MHHW; e.g., below 11.4 feet MLLW).

A Remedial Investigation and Feasibility Study has been completed for the EWOU. The EPA is preparing to issue a Proposed Plan which will set forth the preferred remedial action alternative

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for cleanup of the EWOU. Following public comment on the Proposed Plan, the EPA is planning to select a remedial action for the EWOU in a Record of Decision.

B. INSTRUCTIONS

1. Answer Each Question Completely. Provide a separate answer to each question and subpart set forth in this Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Request and may subject the Respondent to penalties under CERCLA.
2. Response Format and Copies. Provide the responses to this Request and a copy of all requested documents electronically. The submission must include an index that lists all the responsive documents provided, and that indicates where each document is referenced in the written response, and to which question or questions each document is responsive. Additionally, clearly identify and segregate any information claimed by Respondent to be Confidential Business Information (CBI).

Electronic documents must be submitted on a USB drive in Portable Document Format (PDF) and comply with the following requirements:

- a. CBI and personal privacy information should be provided on separate media (e.g., a separate USB drive) and marked as such to ensure information is appropriately handled and physically separated from the other response information in the EPA's files.
 - b. The declaration must be provided in hard copy with an original signature.
 - c. All documents originally smaller than 11 by 17 inches can be submitted electronically; any documents originally larger than 11 by 17 inches must be submitted in hard copy.
 - d. Electronic PDF files must be text searchable.
 - e. The document index must clearly identify any single electronic document which has been separated into multiple electronic files (because of size limitation or otherwise) and each component file that comprises the full document.
3. Number Each Answer. Number each answer with the number of the question to which it corresponds.
4. Provide the Best Information Available. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. Seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to Respondent will be considered noncompliant with this Request.
5. Identify Information Sources. For each question, identify all persons and documents relied upon for the answer.

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6. Confidential Information. The information and documents requested herein must be provided even though Respondent may contend that it includes confidential information or trade secrets. Respondent may assert a confidentiality claim covering part or all of the information requested, pursuant to 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as “trade secret” or “proprietary” or “company confidential.” A confidentiality claim should be supported by the submission of information consistent with 40 C.F.R. Part 2. Information covered by a confidentiality claim will be disclosed by the EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information received by the EPA, it may be made available to the public by the EPA without further notice.**
7. Disclosure to EPA Contractor. Information and documents submitted in response to this Request may be disclosed by the EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if Respondent asserts that all or part of it is confidential business information. The EPA may provide the information and documents to its contractors for the purpose of organizing and/or analyzing the information and documents contained in the responses to this Request. If submitting information and asserting it is entitled to treatment as confidential business information, Respondent may comment on the EPA’s intended disclosure within 14 days of receiving this Request.
8. Personal Privacy Information. Personnel and medical files, and similar files that the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from responses, included on separate sheet(s), and marked as “Personal Privacy Information”. Note, however, that unless prohibited by law, the EPA may disclose this information to the general public without further notice.
9. Objections. Respondent must provide responsive information notwithstanding objections to certain questions. To object without providing responsive information may subject Respondent to penalties under CERCLA.
10. Privilege. If a privilege is asserted for any document responsive to this Request, identify (see Definitions) the document and provide the basis for the assertion. If a privilege exists for only a portion of a document, provide the portion of the document that is not asserted to be privileged, identify the portion that is asserted to be privileged, and provide the basis for asserting privilege. **Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Request must be disclosed in the response from Respondent.**
11. Declaration. Respondent must complete the Declaration provided in section D of this Request, certifying the accuracy of all statements in the response.

C. DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601, or Section 300.5 of Volume 40 of the Code of Federal Regulations (C.F.R.), 40 C.F.R. § 300.5, in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "Respondent" shall mean Alaskan Copper & Brass Company, the addressee of this Request, together with the addressee's agents, employees, and contractors.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include, but not be limited to:
 - a. writings of any kind, including, but not limited to, any of the following:
 - i. letters, memoranda, fax transmittals;
 - ii. meeting minutes, telephone records, notebooks;
 - iii. agreements and contracts;
 - iv. reports to Shareholders, management, or government agencies;
 - v. transportation manifests;
 - vi. copies of any document;
 - b. any film, photograph, or sound recording on any type of device;
 - c. any blueprints or drawings; and
 - d. attachments to, or enclosures with, any document.
3. The term "identify" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; and (c) present or last known employer (include full name and address) with job title, position, or business.
4. The term "identify" means, with respect to a corporation, partnership, business trust, or other entity, to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g., corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

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5. The term "identify" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressee, and/or recipient; and (e) a summary of the substance or the subject matter. **Alternatively**, Respondent may provide a complete copy of the document.
6. The term "material" or "materials" shall mean any and all raw materials, commercial products, wastes, chemicals, substances, or matter of any kind.
7. The "period being investigated" and "the relevant time period" shall mean the date of Respondent's first involvement at the Subject Property to the present.
8. The term "Subject Property" shall mean each parcel of property located within one mile of the EWOU currently or previously owned by Respondent or where Respondent has conducted any activities or operations.
9. The "EWOU" shall mean that portion of the Harbor Island National Priority List CERCLA Site described in the Overview section of this Request and depicted in the Figure included with this Request.
10. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including; but not limited to, building debris and asbestos-containing material.
11. The term "activities or operations" shall mean all actions, endeavors, ventures, or financing arrangements related in any manner whatsoever to the use and development of the Subject Property, including surveying, sampling, grading, documentation, photography, demolition, construction, waste storage or disposal, and sales.

D. QUESTIONS

1. Identification and Association with Subject Property

a. Provide the full legal name and mailing address of Respondent.

1(a) Answer:

Alaskan Copper Companies, Inc.
d/b/a Alaskan Copper & Brass Company ("Alaskan Copper")
P.O. Box 3546
Seattle, WA 98124-3546

b. For each person answering these questions on behalf of Respondent, provide that person's:

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- i. full name;
- ii. title;
- iii. business address and electronic mail address; and
- iv. business telephone number.

1(b) Answer:

Adam Rosen
Property Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
adamr@alascop.com
253-796-2706; (b) (6) (cell)

Mason Ward
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P.O. Box 3546
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mnw@alascop.com
253-796-2704, (b) (6) (cell)

Gerald "Jerry" Thompson
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P.O. Box 3546
Seattle, WA 98124-3546
gat@alascop.com
206-382-8379, (b) (6) (cell)

Carl Vinke
Environmental Compliance Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
cbv@alascop.com
206-382-6590, (b) (6) (cell)

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- c. If Respondent wishes to designate an individual for receiving future correspondence from the EPA concerning the EWOU, please indicate so here by providing that individual's name, mailing address, electronic mail address, telephone number, and fax number.

1(c) Answer:

Adam Rosen
Property Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
adamr@alascop.com
253-796-2706; (b) (6) (cell)

Carl Vinke
Environmental Compliance Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
cbv@alascop.com
206-382-6590, (b) (6) (cell)

- d. Provide the address of each Subject Property, the time period when Respondent held any ownership or other interest in the Subject Property, and the type of interest held.

1(d) Answer:

Respondent Alaskan Copper is, and has been since 2001, a wholly owned subsidiary of Alco Investment Company. Rosen Investment Company, a separate family-owned company, owns most of the properties used for Alaskan Copper's operations.

There are, broadly, two "Subject Property" areas based upon the definition in the request (e.g. within 1 mile of the EWOU). These two areas are as follows:

(1) The "Sixth Avenue S. Campus": This area consists of nine properties, which are located at the following addresses:

- 2958 Sixth Avenue S., Seattle, WA 98134 ("Warehouse"): Nesor Investment Co. purchased the property on April 30, 1975 from Rainer Western, Inc. Nesor Investment Co. currently owns this property. The warranty deed is produced at AKC-0000001. Alaskan Copper currently uses this building as a warehouse and for its human resources office. See Responses to Questions 1(e) and 1(h) for further details on use.

- 3200 Sixth Avenue S., Seattle, WA 98134 ("Fabrication Shop"): This property was purchased from National City Truck Rental Company by Rosen Investment Company ("Rosen Inv. Co.") on March 13, 1969, and Rosen Inv. Co. continues to own it today; *see* Statutory Warranty Deed produced at AKC-0000966. This building is Alaskan Copper's current fabrication and production shop, and contains acid passivation tanks, plasma cutting tables, an x-ray machine, and a darkroom. The operations at this location are subject to King County Industrial Wastewater Permit No. 7238-7 (re-issued Feb. 19, 2020). *See* AKC-0001988. King County Industrial Wastewater Permit No. 7238 was first issued to Alaskan Copper for operations at this location in approximately 1984-1985. *See* AKC-0024022. The first industrial wastewater permit that Alaskan Copper could locate in its files was issued to Alaskan Copper on February 28, 1972, for discharges into the City of Seattle Sewerage System. Permit No. 3967, February 28, 1972 at AKC-0020143. *See* Responses to Questions 1(e) and 1(h) for further details on historic use.
- 3301 Sixth Avenue S., Seattle, WA 98134 ("Former Plate Warehouse"): Rosen Inv. Co. purchased this building from Alaska Rental Equipment on December 29, 1977 (the northernmost 135 feet of a parcel that also includes 3317 Sixth Avenue S., below). The statutory warranty deed is produced at AKC-0000069. Rosen Inv. Co. currently owns this property. Alaskan Copper used this building as a warehouse for metal plate storage from the mid-1970s through approximately 2016. It is now leased to third parties. *See* Responses to Question 1(h) for further details on use.
- 3317 Sixth Avenue S., Seattle, WA 98134 ("Former Fabrication Shop"): Rosen Inv. Co. purchased this building from Alaska Rental Equipment on December 29, 1977 (except for the northernmost 135 feet). The statutory warranty deed is produced at AKC-0000069. Alaskan Copper used this building as a fabrication facility from 1977 to approximately 2015. It contained a plasma cutting table and other fabrication equipment during that time period. This building has been leased to third parties since 2015. *See* Responses to Questions 1(e) and 1(h) for further details on use.
- 3405 Sixth Avenue S., Seattle, WA 98134 ("Welding Shop"): Rosen Inv. Co. purchased this building from FMC Corp. (also known as the Link-Belt Company) on September 30, 1971. The statutory warranty deed is produced at AKC-0000115. Rosen Investment Company currently owns and leases this property. Alaskan Copper uses half of this building as an indoor welding shop; the remainder is leased to third parties. *See* Response to Question 1(h) for further details on use.
- 3223 Sixth Avenue S., Seattle, WA 98134 ("Former Corporate Offices"): Morris Rosen, William Rosen, and Kermit Rosen purchased this property from several individuals (Ruth Dawson, Helen Tobin, Richard Tobin, Elizabeth Fitzmaurice, and Robert Tobin, III) on December 18, 1951. *See* AKC-0000968. Rosen Inv. Co. owns it today. Alaskan Copper used this building as its corporate offices and as a warehouse until approximately 2004. It is now leased to third parties. *See* Response to Question 1(h) for further details on use.

- 3300 Sixth Avenue S., Seattle, WA 98134 (“Former Garage”): A Quit Claim Deed recorded November 14, 2003 shows a transfer from Central Puget Sound Regional Transit Authority to Nesor Investment Company; employee reports state that this property was acquired from Puget Sound Transit Authority as part of a condemnation process for light rail operations in the area. The Deed is produced at AKC-0000912. Previous owners used and leased this property as a truck depot, loading dock, and garage. Alaskan Copper has never used this property for operations. It is currently owned by Alco Investment Co. and leased to third parties. See Response to Question 1(h) for further details on use.
 - 3400 Sixth Avenue S., Seattle, WA 98134 (“Former Aurora Crane”): Alco Investment Co. purchased this property from the Aurora Crane Company on December 9, 1999. The Deed is produced at AKC-0000909. Alaskan Copper has never used the property for operations. Alco Investment Company demolished the building that formerly occupied this address in 2018. MTR Western, Inc. now leases the property from Alco Investment Co. and uses it for bus and trolley storage. See Demolition Plan at AKC-0000872. See Response to Question 1(h) for further details on use.
 - 628 S. Hanford Street., Seattle, WA 98134 (“Maintenance Building”): This building is currently part of 2958 Sixth Avenue South according to King County Assessors (see above for acquisition history). Alaskan Copper historically used this building for maintenance work, repairs, and refurbishing equipment. However, it has been primarily used by Alaskan Copper for storage since approximately 2012. See Responses to Questions 1(e) and 1(h) for further details on use.
- (2) 3600 E. Marginal Way S., Seattle, WA 98211 (“Original Building”): Alaskan Copper acquired this property in 1918 when it purchased it from Star Brass Works. Alaskan Copper began using this property as a metal fabrication shop from that time until approximately 1992. Rosen Inv. Co. currently owns this property. Rosen Inv. Co. has leased this property to “Big Building, LLC” as an art and craft studio and creative space since 2000. See Responses to Questions 1(e) and 1(h) for further details on use.

There are no other properties within the “Subject Property” area in which Alaskan Copper holds any ownership or other property interest. See Responses to Questions 1(e), 1(h), and 1(q) for additional information on historical uses, operations, and activities for each of the properties identified above.

e. Identify all materials used or created by Respondent’s activities or operations at each Subject Property.

1(e) Answer:

Alaskan Copper is a metal fabrication company originally founded as a marine coppersmith in 1913. It has continued as a non-ferrous metal fabrication and welding shop from the 1920s to the present. Alaskan Copper has never been a smelter or forge. It fabricates finished metal products for industrial uses. Fabrication includes shaping, forming, and

bending metal to customer supplied specifications. Example products include heat exchangers, pressure vessels, tanks, columns, and custom corrosion-resistant piping systems.

Alaskan Copper's current business is devoted exclusively to fabricating stainless steel, high nickel alloys, copper-nickel alloys, aluminum, titanium, zirconium, copper, and other weldable corrosion-resistant alloys for the marine, paper, petrochemical, food processing, and other industries. *See Alaskan Copper Fabrication Catalog at AKC-0000235.*

Alaskan Copper's activities currently take place at its Sixth Avenue Campus, which is almost a full mile from the EWOU. Before approximately 1999, Alaskan Copper also conducted fabrication activities and operations at its 3600 E. Marginal Way building, which is approximately one-third of a mile from the EWOU. Alaskan Copper's operations and activities do not regularly use PCBs. Alaskan Copper discharges all process wastewater into the King County publicly owned treatment works under its King County Industrial Wastewater Permit. Stormwater runoff to the EWOU constitutes a very small portion of Alaskan Copper's stormwater discharges, and a de minimis percentage of the overall basin that drains to the EWOU. *See Response to Question 1(n) and Figures 1-3.*

Materials used and created in acid passivation process:

Alaskan Copper's nitric acid passivation tank is considered a discharge site covered by King County Industrial Wastewater Permit 7238-07 (Site No. A4010). *See AKC-0001988.* Alaskan Copper uses the passivation process to clean metal products after fabrication. This process removes impurities in stainless steel introduced from the welding process that, if left untreated, would potentially cause corrosion. Passivation is not electroplating—Alaskan Copper does not perform electroplating activities. Rather than adding materials to the finished product, as in plating, passivation uses an acid to remove the outer layer of the parent material and any impurities or inclusions.

Alaskan Copper currently conducts all passivation at 3200 Sixth Avenue S. (the "Fabrication Facility") and has conducted passivation there since the mid-1970s. From the mid-1970s to approximately 1992, Alaskan Copper also conducted passivation at a second location: 3600 E. Marginal Way. During passivation, a solution of 10-12 percent nitric acid and ammonium bifluoride (e.g. approximately 3% hydrofluoric acid) is heated to 125 degrees Fahrenheit to assist in the cleaning process. Fabricated metal products are dipped in the passivation tank for cleaning and then rinsed with water. Any potential rinse water spills are contained, treated by the induction of 50% sodium hydroxide to manage pH, monitored, and processed through the wastewater treatment facility under the facility's industrial wastewater permit. This permit is monitored by Alaskan Copper Works and by random sampling drawn by the Department of Ecology through an outside accredited laboratory.

The passivation process creates an etching by-product precipitate designated by Washington State's Department of Ecology under waste code F006 (wastewater treatment sludges from electroplating operations). Although F006 is often associated with

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electroplating by-products, the process is not electroplating; Ecology determined that F006 was the code that best described the passivation by-product for purposes of Alaskan Copper's permit. This by-product is dried via a filter press to a filter cake and recycled by a third-party vendor, World Resources Co., which supplies Alaskan Copper with a Recycling Certificate; example Recycling Certificates are at AKC-0017466 (year 2000), AKC-0016168 (year 2010), and AKC-0015885 (year 2019). A filter press is used for dewatering the metal slag, which is then recycled; the filtrate water is re-processed into the system. *See* AKC-0002017.

Under the King County Industrial Wastewater permit, process water discharged under the permit associated with the passivation process contains chromium, copper, nickel, and zinc, which are subject to monthly sampling and monitoring requirements. Sampling results and permit documents are provided with this response. *See* AKC-0001467 - AKC-0001699; AKC-0002192 - AKC-0015884.

Materials used and created in X-Ray Machine Operations:

Alaskan Copper's x-ray machine operations are also considered a discharge site covered by King County Industrial Wastewater Permit 7238-07 (Site No. A40102). *See* AKC-0001988. At the request of certain customers, Alaskan Copper is required to perform x-ray testing for quality control and to test, for example, weld integrity. To do so, Alaskan Copper processes x-ray film using a GE NDT U Model 8196 processor. The wastewater generated by this operation is processed through a Silver-Star Model SS3120-B and Mark 6WX Silver Refining and Reclamation system. This is a two-step system serviced by Hallmark Refining for Alaskan Copper, as described in AKC-0001751. The system was installed by Hallmark Refining in approximately 1997 in order to obtain maximum silver recovery. Invoices showing Hallmark Refining's servicing of this system are located at AKC-0001700 - AKC-0001985. Process water associated with this system is discharged under Alaskan Copper's King County Industrial Wastewater Permit 7238-7 and sampled quarterly for chromium and silver. Sampling results and permit documents are produced at AKC-0001467 - AKC-0001699; AKC-0001888 - AKC-0002132. The silver is reclaimed and sold to Hallmark Refining Corp., 1016 Dale Lane, Mt Vernon, WA 98774.

Prior to the current Hallmark Refining system, documents show that Alaskan Copper used a 1979 X-Rite 610 Silver Recovery unit to recover silver from x-ray operations AKC-0000884; AKC-0000904. Alaskan Copper sold the old system to Hallmark Refining, which disposed of it and reclaimed the silver within. Prior to 1979, silver bars were made and held in a safe deposit box. From time to time, the bars were sold back to Hallmark Refining.

Materials used and created from Plasma Cutting Table Operations:

Alaskan Copper uses plasma cutting / burning tables as part of its fabrication activities. This process results in an admixture of process water and metal slag waste in the cutting table. The plasma table metal slag and water are removed from the cutting table during scheduled shutdowns (generally annually) with a vacuum truck and contained in a dewatering box. Water from the dewatering box is decanted manually back into the passivation waste stream prior to pre-treatment and discharge. Alaskan Copper allows the

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dewatered solids to dry in a dewatering box and then ships them off site to a state-licensed recycling facility. *See* AKC-0000210. Metal “slag” (dewatered solids) may also be sold to third parties for its metal content.

At some point prior to approximately 2008, the metal slag was alleged to contain TCLP chrome at or above the maximum concentrations listed in 40 CFR Part 261.24 and was therefore processed as D007 “dangerous” waste and transported by third parties (e.g. World Resources). However, updated treatment and testing, including fish bioassays, demonstrated that the slag wastes no longer exhibited the characteristics of RCRA-listed hazardous waste after treatment. AKC-0019558, AKC-0019562. By letter dated January 4, 2011, the Department of Ecology confirmed that the metal slag, as treated, was no longer a dangerous waste under its regulations and was instead a characteristic by-product. AKC-0022708.

The Department of Ecology confirmed, as part of a Medium Waste Generator (MQG) inspection on May 15, 2019 (reported Aug 9, 2019) that:

“[Alaskan Copper Works] waste stream includes: ... Metal cutting slag from their plasma table – This waste stream is exempt from dangerous waste regulations because it meets the definition of a characteristic by-product when being reclaimed, per Department of Ecology letter dated January 4, 2011. Once the metal cutting slag is dewatered, Pacific Iron & Metals buys the metal cutting slag for the metal content.” *See* AKC-0024302.

Post-treatment slag contains chromium and barium at low (sub-regulatory) levels. Sampling results and waste manifests are produced at AKC-0015885 - AKC-0018429.

MSDS and SDS Sheets:

In addition to the materials and operations described above, Alaskan Copper is providing complete MSDS and SDS Sheet indexes available at its facilities. These documents show other materials that may potentially be in use or previously used at Alaskan Copper. However, please note that the presence of a material on an MSDS or SDS index does not necessarily mean that this material was used in operations or activities.

The most commonly used materials at the Sixth Avenue Campus include: Acetone, Ammonium Bifluoride, Antifreeze, Automatic Transmission Fluid, Gasoline, Gear Oil, Hydraulic Oil, Nitric Acid, Oakite Stripper, Paints (Aerosol & Non-Aerosol), Sodium Hydroxide (50%). *See* AKC-0000239 - AKC-0000452 and Response to Question 1(m), below.

- f. Provide copies of all documents regarding the ownership or environmental conditions of the Subject Property, including, but not limited to, deeds, sales contracts, leases, surveys, investigations, sampling, reports, blueprints, “as-builts,” and photographs.**

1(f) Answer:

Please see documents at AKC-0000001 - AKC-0000209; AKC-0000747; AKC-0000873 - AKC-0000883; AKC-0000909 - AKC-0000915; AKC-0000966 - AKC-0000969.

- g. Provide information on the condition of the Subject Property when purchased or at the beginning of the relevant time period; describe the source volume, and content of any fill used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.**

1(g) Answer:

Alaskan Copper does not know the specific nature of any fill used during the construction of any buildings at its properties.

Alaskan Copper's environmental assessment documents include information about potential fill at two properties. SoundEarth Strategies, Inc. conducted a Phase I environmental assessment at the 3405 Sixth Avenue S. property for Alco Investment in May 2018. This Phase I report indicates that tidelands may have been filled during approximately 1909 – 1913 during construction, but Alaskan Copper cannot confirm whether this was done or the source, nature, or volume of any fill materials that may have been used. AKC-0000121.

Similarly, file documents show that Kennedy/Jenks Consulting conducted a Phase I environmental assessment for Bogle & Gates at 3400 Sixth Avenue S. in 1991. This report indicated that a southeast portion of that property may have been filled with "cinder, brick, molten ore foundry wastes, car bodies, and other debris in the 1950s." AKC-0000825. However, this statement appears to be based on employee reports, not testing or direct observation, and Alaskan Copper cannot confirm the source, volume, or nature of any fill used at the 3400 Sixth Avenue S. property.

Alaskan Copper has not constructed any waterside structures such as seawalls, wharves, docks, or marine ways.

h. Describe the activities or operations at each Subject Property including:

- i. the date such activities or operations commenced and concluded; and**
- ii. the types of activities or operations performed at each Subject Property, including but not limited to the use, storage, or disposal of any materials in an outdoor location.**

1(h) Answer:

See generally Alaskan Copper's response to Questions 1(d) and 1(e), above. Alaskan Copper is a metal fabrication company originally founded as a marine coppersmith in 1913.

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It has continued as a non-ferrous metal fabrication shop from the 1920s to the present. Alaskan Copper has never been a smelter or forge. It is instead a fabricator of finished metal products for industrial uses. Example products include heat exchangers, pressure vessels, tanks, columns, and custom corrosion-resistant piping systems. *See* Alaskan Copper Fabrication Catalog at AKC-0000235.

Currently, Alaskan Copper's operations and activities, as described in response to Question 1(e), are conducted on the "Sixth Avenue Campus." The Campus includes nine properties as described in response to Question 1(d) above. Alaskan Copper's past and present operations and activities at each subject property are described in detail below:

2958 Sixth Avenue S., Seattle, WA 98111 ("Warehouse").

This location serves as an Alaskan Copper storage warehouse and HR office. Alaskan Copper stores metal products there for shipment. Employee reports state that the building may have been a military facility during World War II (pre-dating Alaskan Copper's operations). This facility only stores completed parts, except that a cutting saw is used indoors to cut piping to length for orders.

Only stainless-steel products are stored outside the warehouse, while copper and nickel products are stored inside. Employees observe that approximately 90% of any stormwater collected at this location drains to the city sewer system with the remainder routed to a stormwater treatment system and drain. *See* Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3200 Sixth Avenue S., Seattle, WA 98111 ("Fabrication Shop").

This is the main Alaskan Copper fabrication shop. At this location, Alaskan Copper conducts the passivation and fabrication activities described in response to Question 1(e). The primary products fabricated here are copper and copper nickel alloy and stainless-steel pipe, fittings, and elbows. There are two steel and fiberglass passivation tanks in use at this location. *See* Diagram, AKC-0000210. These tanks have been in use since approximately the early 1970s, although exact installation dates are unknown. The first industrial wastewater permit that Alaskan Copper could locate in its files was issued to Alaskan Copper on February 28, 1972, for discharges into the City of Seattle Sewerage System. Permit No. 3967, February 28, 1972 at AKC-0020143. The 1972 permit indicates that the wastewater from nitric acid passivation and x-ray operations was drained through a limestone bed sump (containing at least 400 lbs. limestone) for acid neutralization before discharge to the municipal sewer. Sampling from 1971 shows chrome, copper, lead, nickel, and zinc as permitted discharges to the sump and eventually to the City of Seattle Municipal Sewerage System.

Discharges from this location to the sanitary sewer system are currently covered under King County Industrial Wastewater Permit 7238-07. *See* AKC-0001988. King County Industrial Wastewater Permit No. 7238 was first issued to Alaskan Copper for operations

at this location in approximately 1984-1985. AKC-0024022. The two nitric acid passivation tanks in use at 3200 Sixth Avenue S. are housed in secondary containment concrete pits in case of any leakage. These tanks are serviced by third party vendors – Clean Harbors, Stericycle (formerly Phillips), and/or Clean Earth have historically been responsible for cleaning out the passivation tanks. Cleanout and service would occur on an as-needed basis (such as when the fiberglass would be observed to “bubble” due to acid exposure). During cleanout, the third-party vendor is responsible for pumping out and disposing of any residue. Alaskan Copper documents show that a leak was detected on November 5, 1990 in the rinse tank of the passivation tank system. This incident was documented in a memo dated December 3, 1990. AKC-0014565. It was described as “trace” (at a rate of 1 drip every 5 seconds). Alaskan Copper repaired this leak. When Alaskan Copper asked Ecology about formally reporting the trace leak, Ecology was “non-committal” so it was not officially reported.

Alaskan Copper also uses a plasma table to cut and fabricate metals at this location. The plasma table is serviced by third party vendors. The “cuttings” or residual scrap from the plasma cutting table are recycled locally by Pacific Iron and Metals. In addition, the plasma table gets cleaned periodically – at this point, employees estimate that it is cleaned every other year, although cleaning was more frequent when it was more heavily used in the past. To clean the plasma table, a third-party vendor (Clean Harbors) vacuums out the water and water materials, which are then put into a Clean Harbors de-watering box so that impurities can precipitate out. Once the metals have been removed from the water, the water is returned to the plasma table for reuse and the metals are recycled locally. *See* AKC-0000210 and Response to Question 1(e). Historical documents circa 1983-1984 indicate that before the current system, Alaskan Copper’s plasma table wastes drained into a sump. The “sump sediment” was then removed to King County dumpsters and landfills, as approved by the King County Solid Waste Division at the time. AKC-0020170, AKC-0020172.

Raw materials and finished goods are stored in the yard at the 3200 Sixth Avenue S. location. *See* Figures 1-3 for diagrams of Alaskan Copper’s current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper’s January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3301 Sixth Avenue S., Seattle, WA 98111 (“Former Plate Warehouse”).

This building was used as a Roadway Truck terminal prior to the mid-1970s, before Alaskan Copper acquired the building. From the mid-1970s through approximately 2016, Alaskan Copper used this building to store plate metals indoors. In 2016, Alaskan Copper moved its plate storage operations to its facility in Kent, Washington. At no point were there plasma cutting or welding operations in this building, although previously there were saws to cut metal plate to order (used from mid-1970s until approximately April 2016). To Alaskan Copper’s knowledge, it did not store any materials outdoors at this location.

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This location is now divided into four sections and leased to multiple companies. See Response to Question 1(q), below. There is an open, fenced-in area surrounding this building. Tenants are not to store any materials in the open area.

See Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus; *see also* Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3317 Sixth Avenue S., Seattle, WA 98111 ("Former Fabrication Shop").

Alaskan Copper conducted operations in this building starting in approximately 1977. From 1977 to 2015 this building was, like 3200 Sixth Avenue S., an Alaskan Copper fabrication facility. It contained a plate shear and plasma cutting tables for cutting metal parts, which would then be transported to 3200 or 3405 for final processing. The plasma cutting tables would be periodically cleaned, although the exact frequency is unknown (employee estimates are that the cleaning would take place quarterly at most). Initially the slag would be shoveled out into a holding container in the 3317 Sixth Avenue S. yard; the wastes were then sent to the Tulalip landfill. Starting in or around February 1992, Alaskan Copper would use a vacuum truck to remove water and slag from the plasma cutting tables into 55-gallon drums. Alaskan Copper employees would pump out liquid from the drums into the treatment system at 3200 Sixth Avenue S., which was permitted under the King County Industrial Wastewater permit; the dewatered solids would then be transported by a third-party transporter, World Resources. *See* AKC-0018424. The plasma tables were removed from 3317 Sixth Avenue S. in approximately 2014.

This location has been leased to A-One Ornamental Ironworks since 2015. See Response to Question 1(q).

There is no current outdoor materials storage at this location. Prior to 2014, Alaskan Copper stored plate and shape materials (metals) outdoors. See Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3405 Sixth Avenue S., Seattle, WA 98111 ("Welding Shop").

This property was originally developed in the mid-1940s for the Link-Belt Company. There are two buildings at this property: an older building, circa 1940s, and a newer addition, which was constructed for Alaskan Copper in the early 1970s over a former parking lot. Alaskan Copper has used this building since 1971 as a fabrication facility; e.g., as a welding shop and fabrication building for large products such as heat exchangers. According to a May 2018 SoundEarth Strategies Phase I Environmental Assessment performed at the property:

A manufacturing facility for the Link Belt Co. operated on the Property between 1946 and 1970. The Link Belt facility was equipped with a machine shop. A paint spray booth was installed on the Property in 1952. A

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metal working facility for Alaskan Copper Works has operated on the Property since 1971. The on-Property buildings were originally heated by an oil-burning hot water system. A new oil-burning furnace was installed as late as 1978. *See* AKC-0000121.

The Alaskan Copper welding shop constituted the whole building until approximately 2018; in 2018 the south portion of the building (the old building) was leased to Pacific Auto Body and a wall installed between the north and south areas. The current Alaskan Copper welding shop is in the north portion only.

This location is also subject to elevated aerial zinc and copper deposition due to its location below Interstate 5, which results in contamination to the property from brake liner and tire dust from traffic. There is no outdoor materials storage at this location. *See* Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3223 Sixth Avenue South ("Former Corporate Offices").

Prior to approximately 2004, this building was used as corporate offices for Alaskan Copper & Brass in the front, with a warehouse section in the back that held metal sheeting, finished products and parts in bins, and cutting tools for finishing. The warehouse function was moved to Alaskan Copper's facility in Kent, Washington approximately 16 years ago. Since 2004, this building has been leased to Second Use, which is a retail store selling reclaimed building materials, appliances, fixtures, and similar home and commercial construction material.

There is no outdoor materials storage at this location. *See* Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3300 Sixth Avenue ("Former Garage").

There are no known historical Alaskan Copper activities or operations at this location. It is currently leased to Cultivar Farms and the Ganja Goddess Cannabis Shop. There is no outdoor use or storage of materials inside the tenant boundary at this location; Alaskan Copper stores finished stainless steel pipe outside the tenant boundary.

3400 Sixth Avenue ("Former Aurora Crane").

There are no known historical Alaskan Copper activities or operations at this location; it was formerly used by Thermo-King and by Aurora Crane. The previous building has been demolished as of 2018; it now is used for parking. There is no outdoor use or storage of materials at this location. *See* Response to Question 1(n) and Figure 4 for drainage information.

628 S. Hanford ("Maintenance Facility").

This location served as Alaskan Copper's maintenance and repair facility from the 1970s until approximately 2012. Approximately 25 employees would conduct maintenance operations here, such as repairing broken press tables or other equipment, and would tear down materials for repair and fabrication. However, it has not been significantly used as a repair facility since approximately 2012; Alaskan Copper now contracts for repair work onsite. This location is currently used for hazardous waste and materials containment indoors, and for storage. *See* AKC-0000210, which contains a diagram of this site.

Finished goods are stored in the yard at this building and at 3200 Sixth Avenue S., as described in the response regarding 3200 Sixth Avenue S. *See* Figure 1 for a map of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

3600 E. Marginal Way ("Original Building").

This location was used as a fabrication shop for Alaskan Copper from 1913 until approximately 1992. It is the original Alaskan Copper building. It has not been used for Alaskan Copper operations or activities since 1992, except as temporary records storage. It has been leased to Big Building LLC as an arts and crafts and creative use space since 2000. *See* Response to Question 1(q).

Prior to 1992, Alaskan Copper conducted fabrication and passivation activities at this location like those conducted at the 3200 Sixth Avenue S. location today. *See* Response to Question 1(e). Wastewater from fabrication operations at 3600 E. Marginal Way were permitted under Metro Industrial Waste Discharge Permit 7201 from late 1984 (when King County first issued Waste Discharge Permit 7201) until the 1990s. *See* AKC-0024021 (December 1984 letter re: Permit 7201); *see also* AKC-0021190; AKC-0021194 (1990 90-day sampling reports for 3600 E. Marginal Way).

Historically, there was a nitric acid passivation tank at this location, which was installed and stored with secondary containment. This tank was formally closed under order from Ecology in 2010; documents memorializing the closure process are at AKC-0018848-AKC-0019514. There were some indicia of damage to the tank and secondary containment system found during the closure, which may have been a result of an earthquake in 2000. Sampling results from this closure can be found at AKC-0018870 and were provided to the Department of Ecology as part of the closure process.

Historical storage practices at this building are unknown, but outdoor materials storage is unlikely since the building footprint encompasses almost the entire parcel. Alaskan Copper is not aware of any current or recent outdoor use or storage of any materials at this property. *See* Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater

drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

- i. **Describe each release of materials at or from a Subject Property, including the type and quantity of the materials, the location of the release, the impacted media, and the response.**

1(i) Answer:

Alaskan Copper discharges stormwater pursuant to its Stormwater Permit issued by the Washington State Department of Ecology, Permit #WAR000139. See the full description of Alaskan Copper's stormwater discharge system in response to Question 1(n). This permit covers discharges from its current facility at 3200 Sixth Avenue S., Seattle. Alaskan Copper has regularly submitted annual reports under its permit. *See* AKC-0000553 - AKC-0000737. Alaskan Copper's facility is located in an industrial area subject to road dust and other activities that may impact its stormwater results. Throughout the permit history at this location, Ecology has noted periodic exceedances of permit levels for copper and zinc. Alaskan Copper is providing all available documentation regarding compliance with its stormwater permit conditions and corrective actions taken.

Alaskan Copper has recently installed an advanced stormwater control system at the Sixth Avenue Campus pursuant to a Consent Decree with Puget Soundkeeper Alliance. *See* Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788.

Alaskan Copper discharges process wastewater from the two nitric acid tanks at its 3200 Sixth Avenue S. facility pursuant to its King County Industrial Wastewater Permit 7238-7 (Site No. A4010), as described in Response to Question 1(e). Alaskan Copper has maintained sampling records, which are being provided at AKC-0001467 - AKC-0001699; AKC-0002192- AKC-0015884. King County has periodically noted exceedances of permit levels, which is shown in the documentation. Documents in Alaskan Copper's files show a single release / leakage event in November 1990, when a break in the plastic tubing that collects condensate from the tank had allowed the condensate to enter the acid tank and overflow the tank into the containment pit. There was also a small leak in the tank located and repaired at that time. *See* AKC-0014565. Alaskan Copper is providing all available documentation regarding compliance with Industrial Wastewater permit conditions and corrective actions.

Alaskan Copper also discharges process wastewater from its x-ray system pursuant to King County Industrial Wastewater Permit 7328-7 (Site No. A4020), as described in Response to Question 1(e). An outside accredited laboratory performs all laboratory analysis pertaining to this permit. A 2009 sampling event by King County from the combined sewer line on Sixth Avenue South indicated elevated concentrations of silver, chromium, copper, and mercury; however, these discharges were never attributed to Alaskan Copper, nor has any notice or enforcement action been taken for any alleged non-compliance or exceedance

by Alaskan Copper. Alaskan Copper's records show that its process wastewater discharges from the x-ray system have consistently complied with Permit 7238-7.

3405 Sixth Avenue S. contains a floor drain for cleaning and pressure testing, which runs into the City of Seattle's combined sewer system. Before approximately 1995, occasional pressure washing may have resulted in runoff from the welding shop into a dirt and asphalt area outside of the building. Exact quantities of any discharge are unknown. Alaskan Copper discontinued the use of pressure washers in approximately 1995 and no pressure washing has been permitted at this facility since.

3600 E. Marginal Way contained a nitric acid passivation tank, which was installed and stored with secondary containment. This tank was formally closed under order from Ecology in 2010; documentation of the closure process is located at AKC-0018848- AKC-0019514. There were some indicia of damage to the tank and secondary containment system found during the closure, which may have been a result of an earthquake in 2000. Sampling results from this closure can be found at AKC-0018870 - AKC-0019514 and were provided to the Department of Ecology as part of the closure process. Ecology did not issue a no further action letter, and instead sent a letter dated September 20, 2010, which determined that additional requirements may need to be met in order to achieve "clean closure" under the Washington Model Toxics Control Act ("MTCA"); however, the Hazardous Waste and Toxics Reduction section would no longer provide oversight. AKC-0022709. Alaskan Copper has not undertaken additional cleanup under MTCA at this time.

According to Catchment Solutions' review of available public and private records conducted in support of Alaskan Copper's April 24, 2020 Slug Discharge Control Plan (SDCP), there are no past reportable incidents, nonroutine, or uncontrolled slug or spill discharges to the sanitary sewer occurring from the Alaskan Copper Works facility. AKC-0000210.

j. Provide information on past dredging or future planned dredging in the EWOU.

1(j) Answer:

Alaskan Copper has never dredged in the EWOU and has no future plans to dredge in the EWOU. Alaskan Copper has no past or present direct connection to the EWOU.

k. Provide all documents pertaining to the use, storage, or disposal of any hazardous substances, pollutants, or contaminants at the Subject Property.

1(k) Answer:

Please see Response to Questions 1(e), 1(h), and 1(i). Hazardous waste manifests from approximately 1989 forward are produced at AKC-0015905 - AKC-0018847. Fish bioassays and similar documents related to hazardous waste testing and disposal are produced at AKC-0013684 - AKC-0013737; AKC-0014166 - AKC-0014169; AKC-0014390 - AKC-0014393; AKC-0014435 - AKC-0014443; AKC-0015204 - AKC-

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0015232; AKC-0019558, AKC-0019562. Documents related to handling plasma table sludge wastes are produced at AKC-0015885 - AKC-0018429; AKC-0022708. Documents related to EPCRA Tier II reporting are produced at AKC-0019515 - AKC-0021361. Documents related to hazardous waste inspections and corrective actions are produced at AKC-0023638 - AKC-0025679.

In addition, documents from the nitric acid tank closure at 3600 E. Marginal Way are provided at AKC-0018848- AKC-0019514. Finally, documents related to hazardous waste (such as asbestos) potentially disposed of as part of renovations or repairs are produced at AKC-0009287 - AKC-0009291; AKC-0013041 - AKC-0013064; AKC-0013386; AKC-0015604 - AKC-0015622.

I. Provide all information on electrical equipment used at the Subject Property, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).

1(I) Answer:

Records related to e-waste, batteries, and fluorescent lights, including records showing disposal of fluorescent light fixtures that may have contained PCBs, are produced at AKC-0007693 - AKC-0007696; AKC-0021362 - AKC-0021448; AKC-0023638 - AKC-0023772.

There are two transformers, belonging to the City of Seattle (City Light), on the Sixth Avenue S. Campus: one located on the southwest side of the 3200 building, and the other located on the east side of the 3223 building. To the best of Alaskan Copper's knowledge, neither transformer has ever been damaged or leaked. Alaskan Copper neither owns nor controls the transformers.

A General Electric PCB log identifying electrical equipment in place at the 3200 Sixth Avenue S. facility in the early 1980s is produced at AKC-0021371. In 1985, Alaskan Copper removed an x-ray machine from service (out-of-service date May 19, 1985) at 3200 Sixth Avenue S. AKC-0021392. As part of the decommissioning process a third party vendor, US Ecology, removed two drums of liquid PCB waste and two PCB-containing capacitors. AKC-0021364.

Annual PCB Reports from 1981 to 2002 show that PCB insulating fluid was stored at the 3200 Sixth Avenue S. facility from 1981-1985; there was no other PCB fluid storage indicated in the records or from employee reports except for a single one-time disposal in 1999 of a drum of PCB oil. AKC-0021398; AKC-0021399. Alaskan Copper has also occasionally disposed of PCB-containing light ballasts. AKC-0007693 - AKC-0007696.

m. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances, pollutants, or contaminants which are or were used at the Subject Property.

1(m) Answer:

The following items are the most used chemicals at Alaskan Copper's Sixth Avenue Campus: Acetone, Ammonium Bifluoride, Antifreeze, Automatic Transmission Fluid, Gasoline, Gear Oil, Hydraulic Oil, Nitric Acid, Oakite Stripper, Paints (Aerosol & Non-Aerosol), Sodium Hydroxide (50%). These have been the most-used chemicals since at least 1989 (and likely before).

Please see the included MSDS Inventory Roster and an updated SDS Inventory Roster at AKC-0000239 - AKC-0000452 for additional information regarding oils or fluids potentially in use or previously in use at Alaskan Copper. The presence of a material on an MSDS or SDS index does not necessarily mean that this material was used in operations or activities at any Subject Property.

- n. Provide any Subject Property drainage descriptions plans or maps that include information about storm drainage which includes, but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to each sanitary sewer.**

1(n) Answer:

Figure 1 shows the current wastewater and stormwater drainage systems at the Alaskan Copper facilities. Additional stormwater drainage plans and maps are included with Alaskan Copper's Stormwater Pollution Prevention Plan, which is produced at AKC-0021788.

Alaskan Copper's facilities are located in an industrial area subject to road dust and other activities that may impact its stormwater results. The 3600 E. Marginal Way S. facility is located within a cloverleaf exit of the West Seattle bridge / the on-ramp to SR99. Stormwater originating at this facility discharges entirely to the King County Combined Sewer System (CSS). There is no City of Seattle (City) Municipal Separated Stormwater Sewer System (MS4) infrastructure connected to the facility.

Stormwater at the Alaskan Copper Sixth Avenue S. Campus discharges to the King County Combined Sewer System (CSS) or to the Lower Duwamish Waterway (LDW) or the East Waterway (EW) through the City's MS4. Approximately 2 acres infiltrates to ground. A total of 4.3 acres discharges to the CSS and approximately 6 acres discharges to the MS4. See Figures 1-3. Prior to 2018, only 0.44 acres (or approximately 9% of the drainage area) that discharged to the MS4 ultimately drained to the EW. Only flows within this small drainage area that exceeded the Ecology approved water quality flow rate ultimately discharge to the EW. This small area at the intersection of Sixth Avenue S. and S. Hanford Street serves as the entrance to the facilities' shipping and receiving yard. Minimal finished product material storage and loading/offloading of material has occurred in this area. After

November 2018, water within this basin no longer discharges to the EW; it is pumped to a centralized treatment system and treated stormwater is ultimately discharged to the LDW.

SIXTH AVENUE S. CAMPUS

Alaskan Copper operates on multiple parcels at the Sixth Avenue S. campus. Prior to 2018, the facility had 11 discrete locations where stormwater discharged to the MS4. Of those, seven were drainage basins with industrial activity and four were solely parking and non-industrial areas. The Alaskan Copper facility is situated on the border of two City MS4 drainage basins. Prior to November 2018, only two outfalls from the Sixth Avenue ACW facility discharged to the Lander Street MS4 (which drains to the EWOU), and 9 outfalls discharged to the Diagonal Street MS4 (which drains to the LDW). See Figure 2. In 2018 and 2019, Alaskan Copper made capital improvements to the stormwater infrastructure and consolidate drainage basins within the Sixth Avenue S. Campus. As a result, all industrial stormwater basins are routed to stormwater treatment systems and ultimately discharge to the Diagonal Street MS4. There are four lift stations routed to treatment with a high-flow bypass routed to the MS4 (one to the Lander Street, three to the Diagonal Street). Four outfalls discharge from administrative parking or tenant parking areas of the facility to the Diagonal Street MS4. Specific discussion of conveyance routes, drainage basins, and treatment systems can be found in the Stormwater Pollution Prevention Plan and engineering reports, produced at AKC-0000555 - AKC-0000822; AKC-0021788, and in the attached Figures.

Lander Street MS4 – Drains to EW

Prior to November 2018, only stormwater entering the MS4 from the small basin at the intersection of Sixth Avenue S. and S. Hanford Street would drain to the Lander Street MS4 which discharges to the EW through the City's Lander outfall. Two catch basins at the Sixth and Hanford intersection discharge to the MS4: one on the north and one on the south side of the S. Hanford St. right-of-way, just within the fence along the western edge of Alaskan Copper's facility. The approximate area drained to the Lander basin through these catch basins is 0.44 acres. Some additional runoff from Sixth Avenue S. discharges through these catch basins. These catch basins are in the former S. Hanford St. right-of-way. The City of Seattle owned this right-of-way prior to 2007, after which Alaskan Copper purchased it from the City. Between 2007 and 2018, the City maintained an easement over the area where the two catch basins were located.

In 2018, Alaskan Copper purchased the easement back from the City of Seattle which allowed Alaskan Copper Works to reroute the catch basins and install a lift station connected to these two catch basins. The lift station now routes all stormwater that would have otherwise been routed to the Lander MS4 to a centralized treatment system that ultimately discharges to the Diagonal St. MS4, and eventually to the LDW. The treatment system became operational on November 18, 2018. A high-flow bypass exists at the lift station that routes any rainfall that exceeds Ecology approved water quality flow rate (which treats 91% of the total runoff volume) to the Lander MS4. By regulation, no more

than nine percent of the annual volume of stormwater runoff is included in the bypass for discharge to the Lander MS4.

Activities within this small drainage basin have remained static over the years. Alaskan Copper uses this small drainage basin as the main entrance to the shipping and receiving area of the facility. A small employee parking area is part of this basin. Additionally, finished product and metal plates are stored on racks within some areas of the basin and occasionally, trucks are loaded or offloaded. Chemical storage or maintenance activities do not occur within this area.

Diagonal Street MS4 – Drains to LDW

Multiple drainage basins within the Alaskan Copper facility ultimately discharge to the Diagonal Street MS4. This area includes most of the 3200 Sixth Avenue S. warehouse, the 3300 building and associated parking lots. Additionally, part of the 3405 facility drains to the Diagonal Street MS4. Prior to May 2018, a total of nine outfalls from Alaskan Copper's facility, draining a total of approximately 4.16 acres, discharged to the Diagonal Street MS4. In May 2018, ACW installed a berm in the SW corner of the 3405 Sixth Avenue S. parcel to ensure the small drainage area there infiltrated stormwater to ground instead of discharging to the MS4. This action removed 0.047 acres that previously drained to the MS4 from the Alaskan Copper parcel. In November 2018, construction was completed on a treatment system that provided treatment to all industrial stormwater drainage basins that discharge to the MS4 east of Sixth Avenue S. The industrial stormwater drainage basins that discharge to the MS4 at 3405 Sixth Avenue S. had treatment installed by 10/30/2019. See Fig. 2 and 3.

King County Combined Sewer System

There are 4.3 acres within the Sixth Avenue S. campus that have always drained to the CSS. This area is mainly north of the 3200 Sixth Avenue S. warehouse where the Hanford trunk line passes through Alaskan Copper's property. A portion of the 3200 Sixth Avenue S. warehouse roof, approximately half of the 3300 Sixth Avenue S. property, and the majority of the 3405 Sixth Avenue S. warehouse roof also drains to the CSS.

Discharge to Ground

The northern portion of the facility discharges stormwater to ground. No drainage infrastructure exists north of the maintenance facility (628 S. Hanford Street) or north of the shipping warehouse (2958 Sixth Avenue S.). All stormwater within this area is detained onsite or within the rail right-of-way and ultimately infiltrates into the ground. One small basin east of the 3200 Sixth Avenue S. warehouse infiltrates into the ground on the east side of the property. The western and southern portions of the 3405 Sixth Ave S. property also infiltrate into the ground. In May 2018 a 0.047-acre basin that had discharged to the Diagonal Street MS4 was bermed. The entire basin now infiltrates and does not enter the MS4. See Fig. 2 and 3. A total of 2.02 acres of the facility infiltrates to ground.

3400 Sixth Avenue S. (former Aurora Crane)

City of Seattle data indicate that the two catch basins on the former Aurora Crane property are connected to the sanitary system. Additionally, it appears that roof drains from the previous building were connected to the sanitary system. Therefore, onsite stormwater would be connected to the sanitary system which flows north to the Hanford trunk line. This line drains to the POTW, except in an overflow event (CSO). An offsite catch basin connected to the MS4 near the northwest corner of the property may have received stormwater from a portion of the northwest corner of the facility. This catch basin, like all MS4 infrastructure in the vicinity of this property, is routed to the Diagonal trunk line which discharges to the Lower Duwamish Waterway.

3600 E MARGINAL WAY S FACILITY

The facility that is located at 3600 East Marginal Way S. entirely drains to the CSS. No stormwater within this parcel is routed to the MS4. The stormwater within this parcel is ultimately routed to the Hanford trunk line of the King County Sewer System. The total area of the parcel is 0.92 acres. See Fig. 1.

- o. With respect to past activities or operations at each Subject Property, provide copies of any stormwater or drainage studies, including data from sampling, conducted at the Subject Property. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during Respondent's occupation of the Subject Property.**

1(o) Answer:

Please see documents produced generally at AKC-0000210 - AKC-0000824; AKC-0001986 - AKC-0004553; AKC-0021449 - AKC-0023637. See Figures 1-3 for diagrams of Alaskan Copper's current and historical stormwater drainage systems at the Sixth Avenue Campus, and Alaskan Copper's January 29, 2020 Stormwater Pollution Prevention Plan, produced at AKC-0021788. Alaskan Copper's April 24, 2020 Slug Control Plan is being produced at AKC-0000210.

- p. Describe each underground storage tank present at any time on a Subject Property, including but not limited to the size and location of the tank, the materials stored in the tank, the time period of use, whether any material leaked from the tank, the type and quantity of leaked material, and the response to the leaked material.**

1(p) Answer:

The Kennedy/Jenks 1991 Phase I environmental assessment for the 3400 Sixth Avenue S. ("Former Aurora Crane") property indicates that two underground storage tanks were

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formerly used for heating oil, had been capped, and were not in use as of 1991. *See* AKC-0000825. However, the report does not indicate when those tanks were installed or capped.

A 2018 Phase I assessment prepared by SoundEarth Strategies, Inc. for Alco Investment indicated the likely presence of a heating oil tank at the 3405 Sixth Avenue S. property (“a fill port and vent pipes for at least one heating oil UST were observed north of Building 3”). This tank was documented as in use in a 1990 letter from Earth Consultants, Inc. to Alaskan Copper Works discussing a proposed environmental assessment for petroleum contamination. AKC-0023867. However, soil sampling in 1990 showed no contamination. AKC-0023875. The tank was used to hold diesel fuel for heating. Heating is now strictly natural gas. Alaskan Copper is currently assessing this tank for potential closure.

The nitric acid passivation tanks used by Alaskan Copper for its operations and activities are aboveground tanks with secondary containment.

- q. **Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a description of the activities or operations they conducted while present at the Subject Property.**

1(q) **Answer:**

See Responses to Questions 1(d) and 1(h), above.

- 3301 Sixth Avenue S., Seattle, WA 98134 (“Former Plate Warehouse”): This building is currently leased by the Rosen Investment Company, LLC (lessor). Leases are for portions of the building space. Tenants include:

- Lockhart Suver (2016-2017) (construction contracting)
- Hermanson Company LLP (2016-2020) (construction contracting and carpentry)
- Hoffman Construction Co. (2017) (construction contracting)
- Re-Up Industries (2017) (processing 1-502 approved cannabis)
- Gary Merlino Construction (2018-2020) (construction contracting)
- Space Needle LLC (2018) (operations unknown)
- Mid-American Elevator (2019) (elevator repairs)

Rosen Investment Company requires tenants to comply with all applicable federal, state, and local environmental laws, regulations, codes, and ordinances for waste handling and disposal. Lease documents related to 3301 Sixth Avenue S. are produced at AKC-0000007 - AKC-0000068.

- 3317 Sixth Avenue S., Seattle, WA 98134 (“Former Fabrication Shop”): This building is currently leased by the Rosen Investment Company, LLC (lessor). Tenants at this location include A-One Ornamental Iron Works (2015) and Rob Finlon, Inc. (2015-2020). Rob Finlon is the owner of A-One Ornamental Iron Works, which conducts welding and fabrication in support of elevator contractors in the area. There is a paint booth installed at this location for tenant operations. Rosen Investment Company requires tenants to comply with all applicable federal, state, and local environmental

laws, regulations, codes, and ordinances for waste handling and disposal. Lease documents related to 3317 Sixth Avenue S. are being produced at AKC-0000074 - AKC-0000114.

- 3405 Sixth Avenue S., Seattle, WA 98134 (“Welding Shop”): This building is currently leased by the Rosen Investment Company, LLC (lessor). Leases are for portions of the building space. Tenants include:
 - Lockhart Suver (2017) (construction contracting)
 - Gary Merlino Construction (2017) (construction contracting)
 - Markey Machinery (2017) (storage)
 - Pacific Auto Body (2018-2020) (auto body shop)

A large portion of the warehouse area was leased to Pacific Auto Body in September 2018 for a ten-year term of lease. This area is designated for use as an auto body and paint shop, and includes a paint booth, air compressors, welders, and similar equipment used for auto body and painting work. This work is conducted inside the building, and no work is conducted outdoors. In 2018, a wall was constructed to accommodate this lease, and the building is now divided into a northern portion (used by Alaskan Copper) and a southern portion (Pacific Auto Body). Rosen Investment Company requires tenants to comply with all applicable federal, state, and local environmental laws, regulations, codes, and ordinances for waste handling and disposal. Lease documents related to 3405 Sixth Avenue S. are produced at AKC-0000122 - AKC-0000173.

3223 Sixth Avenue S., Seattle, WA 98134 (“Former Corporate Offices”): This building was historically Alaskan Copper & Brass Company’s office. Rosen has leased this property to Second Use Building Materials, Inc., since 2012. The permitted uses include storage and retail of used and recycled building materials in addition to general and administrative office use. Rosen Investment Company requires tenants to comply with all applicable federal, state, and local environmental laws, regulations, codes, and ordinances for waste handling and disposal. Lease documents related to 3223 Sixth Avenue S. are produced at AKC-0000916 - AKC-0000965.

- 3600 E. Marginal Way: This location was the main location for Alaskan Copper until the 1970s, and was an Alaskan Copper operations location until the late 1990s. See answers to 1(h). It has been leased to Big Building LLC since December 2000. Lease at AKC-0000175. The authorized uses in the lease include metal fabrication (architectural, blacksmithing, sculptural, casting, etc.); woodworking (millwork, sculptural, furniture, arboreal, etc.); glasswork (glass blowing, slumping, cold working, casting, etc.); printing (etching, silk screening, etc.); photography; graphic design; web engineering and support; music studios (acoustical, digital, recording, etc.); architectural; design; any work that may be considered arts and crafts; and industrial use and/or storage of warehoused materials. All uses are indoor. Rosen Investment Company requires tenants to comply with all applicable federal, state, and local environmental laws, regulations, codes, and ordinances for waste handling and disposal.

- r. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:**
- i. the U.S. Bankruptcy Court in which the petition was filed;**
 - ii. the docket numbers of such petition;**
 - iii. the date the bankruptcy petition was filed;**
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and**
 - v. a description of the current status of the petition.**

1(r) Answer:

Alaskan Copper & Brass Company has not filed or petitioned for bankruptcy.

- s. If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use, purchase, storage, disposal, placement, or other handling of hazardous substances, pollutants, or contaminants, or transportation of hazardous substances, pollutants, or contaminants to or from, the Subject Property.**

1(s) Answer:

Bill Rosen
c/o Adam Rosen
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546

2. Financial Information

- a. Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2015, 2016, 2017, 2018, and 2019. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail.**

2(a) Answer:

Alaskan Copper (Respondent) is a "disregarded entity" for tax purposes. It is providing the 2015-2018 tax returns for its parent company, Alco Investment Company, at AKC-CBI-0000496 - AKC-CBI-0001886. Alco Investment Company has not yet prepared its 2019

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tax return. Alco's tax information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

- b. Provide Respondent's financial interest in, control of, or that Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in the federal tax returns or other financial information to be presented to the EPA. If there are such assets, identify each asset by type of set, estimated value, and location.**

2(b) Answer:

Please see Alco tax returns referenced at AKC-CBI-0000496 - AKC-CBI-0001886. There are no assets of which Respondent is a beneficiary that have not been included in the tax return records. This information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

- c. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:**
- i. a general statement of the nature of relationship, indicating whether the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of Respondent's business operations at the Subject Property;**
 - ii. the dates such relationship existed;**
 - iii. the percentage of ownership of Respondent that is held by such other entity(ies);**
 - iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;**
 - v. providing any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of Respondent associated with the Subject Property or the EWOU; and**
 - vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net**

income, depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

2(c) Answer:

Alaskan Copper is, and has been since 2001, a wholly owned subsidiary of Alco Investment Company. There are no other entities with interests in Alaskan Copper.

Please see tax returns referenced at AKC-CBI-0000496 - AKC-CBI-0001886. This information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

3. Insurance Coverage

- a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the Subject Property or EWOU and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup and include the years such policies were in effect.**

3(a) Answer:

Please see Table 1 for a listing of known and potential insurance policies that may be applicable to costs of environmental investigation or cleanup related to the Subject Properties. This table only includes known or potential policies held prior to 1986. This information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

- b. If there are any such policies from question "5a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:**
- i. the name and address of each insurer and of the insured;**
 - ii. the type of policy and policy numbers;**
 - iii. the per occurrence policy limits of each policy; and**
 - iv. the effective dates for each policy.**

3(b) Answer:

Please see Table 1 for a listing of known and potential insurance policies that may be applicable to costs of environmental investigation or cleanup related to the Subject Properties, the names and addresses of the insurer and insured, the type of policies and policy numbers, and the per-occurrence policy limits on each policy.

- c. **Identify all insurance brokers or agents who placed insurance for Respondent at any time during the period being investigated, as identified at the beginning of this request and identify the time period during which such broker or agent acted in this regard.**

3(c) Answer:

Please see Table 1 for a listing of insurance brokers and agents affiliated with the policies identified. This information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

- d. **Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of Respondent under any insurance policy in connection with the Subject Property or EWOU. Include any responses from the insurer with respect to any claims.**

3(d) Answer:

There have not yet been any claims made by or on behalf of Respondent under any policy in connection with any Subject Property, including those policies listed in Table 1.

- e. **Identify any previous settlements with any insurer in connection with the Subject Property or EWOU, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by Respondent or insurer.**

3(e) Answer:

Alaskan Copper is not aware of any previous settlements between Alaskan Copper and any insurer in connection with the Subject Properties or EWOU, or any claims for environmental liabilities for the time period under investigation. Alaskan Copper did make a claim related to potential environmental liabilities at the Western Processing Superfund site in approximately 1989. *See* AKC-CBI-0000001.

- f. **Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.**

3(f) Answer:

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Please see AKC-CBI-0000002 - AKC-CBI-0000495 for documents responsive to this request, including documents used to create Table 1. This information has been marked as Confidential Business Information and is subject to protection against disclosure under 40 C.F.R. Part 2, Subpart B and 5 U.S.C. § 552(b)(4).

g. Identify Respondent's policy with respect to document retention.

3(g) Answer:

Alaskan Copper nominally has a seven-year retention policy for general documents; however, in an abundance of caution environmental files have been maintained by Gerald Thompson, Environmental Health and Safety Supervisor, during his tenure (since approximately 1988). Additional files were found in Alco Investments corporate offices in Kent, Washington, and are subject to indefinite retention.

4. Compliance with This Request

a. Describe all sources reviewed or consulted in responding to this Request, including, but not limited to:

- i. the name and current job title of all individuals consulted; and**
- ii. the location where all documents reviewed are currently kept.**

4(a) Answer:

Sources reviewed and consulted include:

Adam Rosen
Property Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
adamr@alascop.com
253-796-2706; (b) (6) (cell)

Mason Ward
Chief Financial Officer
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
mnw@alascop.com
253-796-2704, (b) (6) (cell)

Gerald "Jerry" Thompson
Environmental Health and Safety Supervisor

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Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
gat@alascop.com
206-382-8379, [REDACTED] (cell)

Carl Vinke
Environmental Compliance Manager
Alaskan Copper Companies, Inc.
P.O. Box 3546
Seattle, WA 98124-3546
cbv@alascop.com
206-382-6590, (b) (6) (cell)

Chad Wiggins
Catchment Solutions LLC
P.O. Box 94206
Seattle, WA 98124
(206) 535-8284

Jeff Berebitsky
Restorical Research, LLC
9906 N. Clarendon Avenue
Portland, OR 97203
(503) 236-8616

Publicly available documents from the Washington State Department of Ecology Permitting and Reporting Information System (PARIS) database are available at (<https://apps.ecology.wa.gov/paris/PermitLookup.aspx>).

Documents related to environmental compliance and environmental permitting are stored in the Environmental Health and Safety Manager's office at 3200 Sixth Avenue S., Seattle, WA 98134. Corporate and financial records are stored at the corporate offices of Alco Investments, located at 27402 72nd Avenue S., Kent, WA 98302.

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E. DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on August 31, 2020.



Signature



Type or Print Name



Title

Mailing Address:

PO Box 3546
Seattle, WA 98124